

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MARK S. CARTER	)	CASE NO.
COMPLAINANT	)	2015-00184
V.	)	
PEOPLES GAS KY, LLC	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO PEOPLES GAS KY, LLC

Peoples Gas KY, LLC ("Peoples"), pursuant to 807 KAR 5:001, is to file with the Commission the original, and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 14 days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Peoples shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Peoples fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a document containing personal information, Peoples shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to Mark S. Carter's April 30, 2015 complaint letter ("Carter letter") and to the July 1, 2015 Answer of Peoples Gas KY, LLC ("Answer"). State whether it is the understanding of Peoples that the complainant is eligible to receive gas service pursuant to KRS 278.485 and 807 KAR 5:026, the statute and regulation governing the provision of service from gas pipeline companies obtaining gas from producing wells to owners of property on or over which any producing well or gas gathering pipeline is located or whose property and point of desired service is within one-half air-mile ("farm tap service").

a. If so, state whether it is the understanding of Peoples that KRS 278.485 requires that eligible property owners be provided farm tap service if it is requested and that the request cannot be refused unless the producing gas well or gathering pipeline is abandoned or is subject to federal jurisdiction.

b. If so, provide an explanation of the denial of farm tap service to the complainant. The explanation should include copies of any correspondence or email messages from EQT Production ("EQT") relating to the basis of the denial referenced in the Answer.

c. If the denial of farm tap service is due to any reason other than the abandonment of the gas well or gathering pipeline, or their being under federal jurisdiction, state whether it is Peoples' understanding that the denial is in violation of KRS 278.485.

d. If the denial of farm tap service to an eligible customer is due to any reason other than the abandonment of the gas well or gathering pipeline, or their being under federal jurisdiction, and if the eligible customer continues to be denied service, state what entity, in the opinion of Peoples, would most appropriately be the subject of a subsequent Commission investigation to determine possible penalties.

e. Clarify whether EQT denied the request for farm tap service and that EQT itself was not denied by another entity, as implied by statement 3 of the Answer.

2. Provide copies of all contracts between Peoples and EQT or any affiliate of EQT.

3. Describe the process to request a farm tap service from EQT. Provide copies of all correspondence and electronic mail messages between Peoples and EQT concerning this request for farm tap service.

4. Describe the gathering-line system to which the farm tap service connection was denied and provide a map with details including the size of pipelines and locations of gas wells.

5. State whether the gathering line system is connected to the systems subject to Case Nos. 2015-00185<sup>1</sup> and 2015-00186<sup>2</sup>.

6. State whether any customer(s) eligible for farm tap service, other than those represented by this complaint and by those that are the subject of Case Nos. 2015-00185 and 2015-00186, have been denied service. If so, state how many and provide details concerning each denial.

7. With regard to the complainant's claim that he originally received an approved application for service from EQT, state whether it is Peoples' understanding that EQT now or previously provided farm tap service to end-use customers other than through Peoples.

8. With regard to the complainant's claim that he returned an application for service to "100 EQT Way, KY.," state whether Peoples has ever conducted business at this location.

a. If so, state whether Peoples was conducting business at this location on June 4, 2014.

b. If so, provide the name, address and current employment status of any employee or contractor of Peoples assigned to work at that location on that date.

c. If not, state whether EQT or another entity was conducting business at this location on June 4, 2014.

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<sup>1</sup> Case No. 2015-00185, *James R. Collings v. Peoples Gas KY, LLC* (filed Apr. 30, 2015).

<sup>2</sup> Case No. 2015-00186, *John Preston v. Peoples Gas KY, LLC* (filed Apr. 30, 2015).

9. With regard to the complainant's claim that other applicants for farm tap service were provided service subsequent to his request for service's being denied, state whether this is correct, and if so, how the circumstances surrounding those customers' receipt of service differ from that of the complainant.



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Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED SEP 10 2015

cc: Parties of Record

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